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Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,
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[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon
Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL
IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT ZUFFA,
LLC'S MOTION TO SEAL ITS REPLY IN
SUPPORT OF MOTION FOR SUMMARY
JUDGMENT AND RELATED
MATERIALS (ECF NO. 614)**

1 I, Kevin E. Rayhill, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc., Co-Lead Counsel for the Classes
3 and Attorneys for Individual and Representative Plaintiffs. I am a member in good standing of the State
4 Bar of California, and have been admitted *pro hac vice* in this Court. I am over 18 years of age and have
5 personal knowledge of the facts stated in this Declaration. If called as a witness, I could and would
6 testify competently to them.

7 2. I make this Declaration in Support of Plaintiffs' Opposition to Defendant Zuffa, LLC's
8 Motion to Seal Its Reply In Support of Motion for Summary Judgment and Related Materials (ECF No.
9 614) (the "Opposition").

10 3. Attached hereto as Exhibit 1 is a chart I created entitled "Zuffa's Sealed Documents —
11 Plaintiffs' Arguments Against." It has sections corresponding to the four categories of documents Zuffa
12 asks the Court to seal in Zuffa, LLC's Motion to Seal Zuffa's Reply in Support of Motion for Summary
13 Judgment and Related Materials (ECF No. 614) (the "Motion to Seal"): Contracts, Financial
14 Information, Business Strategy, and Third Party Information. Exhibit 1 contains three columns. The
15 first column is entitled "Document" and lists the materials Zuffa asks the Court to seal. These entries
16 are taken directly from Zuffa's Motion to Seal. The second column is entitled "Description" and
17 contains brief summaries I created of the content of the materials Zuffa asks the Court to seal. The third
18 column is entitled "Argument Against" and contains brief statements of why Plaintiffs believe the
19 materials should not be sealed (with the exception of some Third Party Information section, which
20 Plaintiffs have indicated they do not oppose sealing).

21 4. Attached hereto as Exhibit 2 is a true and correct copy of an article written by Adam
22 Swift, entitled "Inside the Standard Zuffa Contract," and published on the Sherdog.com website on
23 Oct. 31, 2007. This article was downloaded from the Internet at my direction on October 17, 2018, and
24 is available for download at [http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-](http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-Contract-9734)
25 [Contract-9734](http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-Contract-9734)<http://www.sherdog.com/news/articles/Inside-the-Standard-Zuffa-Contract-9734>.

26 5. Attached hereto as Exhibit 3 is a true and correct copy of an article entitled "The
27 Business of Fighting: A Look Inside the UFC's Top-Secret Fighter Contract." The article was written
28 by Jonathan Snowden and was published on the Bleacher Report website on May 14, 2013. The article

1 was downloaded from the Internet at my direction on October 17, 2018, and is available for download at
2 [https://bleacherreport.com/articles/1516575-the-business-of-fighting-a-look-inside-the-ufcs-top-secret-](https://bleacherreport.com/articles/1516575-the-business-of-fighting-a-look-inside-the-ufcs-top-secret-fighter-contract#slide8)
3 [fighter-contract#slide8](https://bleacherreport.com/articles/1516575-the-business-of-fighting-a-look-inside-the-ufcs-top-secret-fighter-contract#slide8).

4 6. Attached hereto as Exhibit 4 is a true and correct copy of an article entitled “Bjorn
5 Rebney Explains 'Key Misunderstanding' in UFC Contract Match for Eddie Alvarez.” The article was
6 written by Brian Hemminger and was published on the SB Nation MMA Mania website on January 9,
7 2013. The article was downloaded from the Internet at my direction on November 16, 2018, and is
8 available for download at [https://www.mmamania.com/2013/1/9/3853442/bjorn-rebney-lawsuit-eddie-](https://www.mmamania.com/2013/1/9/3853442/bjorn-rebney-lawsuit-eddie-alvarez-bellator-mma-ufc-contract-match)
9 [alvarez-bellator-mma-ufc-contract-match](https://www.mmamania.com/2013/1/9/3853442/bjorn-rebney-lawsuit-eddie-alvarez-bellator-mma-ufc-contract-match).

10 7. Attached hereto as Exhibit 5 is a true and correct copy of an article entitled “Dana
11 White's White Whale: The UFC Chased Fedor for Years, but He Always Got Away.” The article was
12 written by Karim Zidan and was published on the BleacherReport.com website on February 14, 2017.
13 The article was downloaded from the Internet at my direction on November 15, 2018, and is available
14 for download at [https://bleacherreport.com/articles/2691020-dana-whites-white-whale-the-ufc-chased-](https://bleacherreport.com/articles/2691020-dana-whites-white-whale-the-ufc-chased-fedor-for-years-but-he-always-got-away)
15 [fedor-for-years-but-he-always-got-away](https://bleacherreport.com/articles/2691020-dana-whites-white-whale-the-ufc-chased-fedor-for-years-but-he-always-got-away).

16 I declare under penalty of perjury and the laws of the United States that the foregoing is true and
17 correct and this Declaration is executed in San Francisco, California on November 16, 2018.

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19 By: /s/Kevin E. Rayhill
20 Kevin E. Rayhill
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